

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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April 6, 2001

Mr. Harry Boston, Manager United States Department of Energy Office of River Protection P.O. Box 450, MSIN: H6-60 Richland, Washington 99352

Ms. Mary P. Delozier CH2M Hill Hanford Group P.O. Box 1500, MSIN: H6-08 Richland, Washington 99352 PECELVED APR 1 7 2001 EDMC

Dear Mr. Boston and Ms. Delozier:

Re: Receipt of Double-Shell Tanks (DSTs) Emergency Pumping Guide

On July 8, 1998, the Washington State Department of Ecology (Ecology) issued a Notice of Correction (NOC) to the United States Department of Energy (USDOE) and its contractors citing five (5) violations of Chapter 40, 265, Code of Federal Regulations (CFR), Subpart J, Tank Systems. Ecology's NOC described waste tank management deficiencies in the DST System and corresponding corrective measures to remedy them. On October 6, 2000, Ecology issued a letter closing out the corrective measures and advising that a revised DST Emergency Pumping Guide remained a requirement to operate the DST System in compliance with waste tank regulations.

The USDOE transmitted the final revision of the DST Emergency Pumping Guide (HNF-3484, Rev. 3) to Ecology in a March 6, 2001, letter (01-OPD-013). Ecology has reviewed and accepts the DST Emergency Pumping Guide. As a result of this review, Ecology considers all actions associated with the July 8, 1998, NOC closed; however, please be advised that the DST Emergency Pumping Guide must be kept current.

The DST Emergency Pumping Guide may need to be revised in the future to accommodate changes in DST operations. For example, Section 1.3 of the DST Emergency Pumping Guide describes approval processes that must occur to remove or add waste to watch list tanks. However, mitigation of watch list tank safety concerns is scheduled for completion by September 30, 2001, per milestone M-40-00 within the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). Therefore, once resolution of all watch list tank issues has been

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completed, the DST Emergency Pumping Guide should be revised to remove the actions described in Section 1.3 of the DST Emergency Pumping Guide and the emergency pumping times should be revised to remove delays associated with administrative approvals for transferring waste in or out of former watch list tanks.

If you have any questions or concerns regarding this letter, please feel free to contact me at (509) 736-3031.

Sincerely,

Bob Wilson,

Nuclear Waste Program

Bob William

BW:sb

cc:

Dana Bryson, USDOE
Cliff Clark, USDOE
Michael Royack, USDOE
Phil Miller, CHG
Roger Bowman, FH
Mary Lou Blazek, OOE
Administrative Record: DST System